

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
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From: Department of Toxic Substances Control (DTSC)
Cleanup Program - Cypress
5796 Corporate Avenue
Cypress, CA 90630

Project Title: Air Force Plant 42, Site 28 Installation Restoration Program (IRP) Proposed Plan

Project Location: Air Force Plant 42, near Palmdale, California

County: Unincorporated, Los Angeles County

Project Description: The Proposed Plan (PP)/Draft Feasibility Study (FS) summarize alternatives evaluated and the preferred site-specific remedial action alternatives for Installation Restoration Program (IRP) Site 28.

The remedy selected is land use restrictions that would prevent residential use of the land (without further DTSC evaluation and management of possible future exposure and risk). These restrictions would also prevent excavation without DTSC approval.

Background:

Site 28, Dust Control Area is situated in the northern portion of AFP 42, at the northeast border of Plant Site 2, within the Plant Site 2 fence line. This area is approximately 5.9 acres. Surface soil staining present onsite resulted from historical dust control activities, which consisted from spraying oil on the surface and then tilling the oil into the surface soil.

Site 28 was identified as the Dust Control Area in the 1983 IRP Records Search (CH2M HILL, 1983) and initially investigated during the Phase II Environmental Baseline Survey (EBS) activities performed in 2004 and 2005 (CH2M HILL, 2006). Based on results of the Phase II EBS, the Dust Control Area was designated as IRP Site 28 in 2007.

A remedial investigation (RI) was performed in 2007 and 2008. Sampling and analysis during the Remedial Investigation found elevated concentrations of polycyclic aromatic hydrocarbons (PAHs) in shallow soil throughout the site. Polychlorinated biphenyls (PCBs) were sporadically detected. Based on the results of the RI report, the site does not pose an unacceptable threat to groundwater.

Summary of Site Risks

The human health risk assessment (HHRA) was used to determine the magnitude and probability of actual or potential harm to public health, safety, and welfare posed by the threatened or actual release of constituents at or from the site assuming no action. The HHRA evaluated the noncancer and cancer risks. The risks are evaluated based on the cumulative risk, which is the potential risk from all contaminants in the soil, groundwater, and indoor air combined.

Noncancer risk was evaluated in terms of a hazard index (HI). If the HI is above 1, there is a possibility of adverse health effects caused by a chemical or multiple chemicals. The HI value is less than 1 for all exposure scenarios at Site 28.

Cancer risk was expressed in terms of the probability that an individual would have an increased chance of contracting cancer over a lifetime period of 70 years. This is called the excess lifetime cancer risk (ELCR). For example, an ELCR of 1×10^{-6} means that an exposed person could have an increased likelihood of 1 in a million to develop cancer. ELCR values are compared to 1×10^{-6} , a level that is considered the California point of departure. Sites with ELCR values exceeding this level require a risk management decision that includes evaluating site-specific characteristics and exposure scenario factors. USEPA defines the risk management decision range as 1×10^{-6} (one in a million ELCR) to 1×10^{-4} (USEPA, 1990). ELCR values greater than 1×10^{-4} are considered to have unacceptable risk.

Cancer risks at IRP Site 28 fall within the risk management range for all exposure scenarios:

- Current security/maintenance worker – For the current security and maintenance worker scenario, the estimated ELCR value is 1.1×10^{-5} .

- Potential future security/maintenance worker – For the potential future security and maintenance worker scenario, the estimated ELCR value is 1.1×10^{-5} .
- Potential future trench worker - For the potential future trench worker scenario, the estimated ELCR value is 2.6×10^{-6} .
- Potential future occupational worker – For the potential future occupational worker scenario, the estimated ELCR value is 2.9×10^{-5} .
- Hypothetical future resident – For the potential future residential scenario, the estimated ELCR value is 9×10^{-5} .

Selected Remedy

The IRP Site 28 FS was prepared to evaluate the need for potential remedial actions and/or institutional controls to address the contamination at Site 28. Four alternatives were evaluated.

Alternative 1 – No Action. The No Action alternative is required as a baseline for comparison with other remedial action alternatives in accordance with the National Contingency Plan.

Alternative 2 – Institutional Controls. Alternative 2 consists of implementing institutional controls (ICs) to restrict land use to limit worker exposure to soil at the site and to prevent future residential development in the area.

Alternative 3 – Capping and Institutional Controls. Alternative 3 consists of placing a cap on top of the contaminated soil at IRP Site 28 to prevent future human exposure to the contaminants. In addition to the cap, ICs would be implemented to ensure inspections and maintenance of the cap, and to restrict future land use so that the land could not be used for future residential development.

Alternative 4 – Excavation and Offsite Disposal. Alternative 4 consists of excavation and offsite disposal of the impacted soil driving the risk at IRP Site 28. The required excavation depth for the site is 3 feet below ground surface (bgs). All excavated soil would be profiled and taken offsite for disposal at an approved landfill. Clean import soil would be used to backfill the excavation.

These remedial action alternatives were evaluated on the basis of the nine USEPA criteria. However, two of the USEPA criteria, acceptance by supporting agencies and acceptance by the community, will be addressed when those parties have reviewed and commented on the FS report.

Alternative 2, Institutional Controls, was selected for Site 28. Restrictions would prevent residential use of the land from occurring without further DTSC evaluation and management of possible future exposure and risk. No excavation would occur without DTSC approval. Normal surface use of site for industrial workers would not be limited. Alternative 2 meets the Remedial Action Objectives and provides protection of human health and long-term effectiveness of the remedy.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: U.S. Air Force, Restoration Division, Aeronautical System Center,
Engineering Directorate (ASC), WPAFB, Ohio
Contact: George Warner

Exemption Status: (check one)

- ☐ Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- ☐ Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
- ☐ Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(b)(c)]
- ☐ Categorical Exemption: [State type and section number]
- ☐ Statutory Exemptions: [State code section number]
- ☒ General Rule [CCR, Sec. 15061(b)(3)]

Exemption Title: With Certainty, No Possibility of a Significant Effect on the Environment.

Reasons Why Project is Exempt:

1. The site is located within the boundaries of AFP 42, an active military installation. Land use at AFP 42 is limited to industrial operations and encompassed by barbed-wire fencing. Site access is through designated gates that are manned by security personnel 24 hours per day. In addition, each plant site is also secured by barbed-wire fencing and 24-hour security at the plant site-specific access gates. There is no access available to the area by the general public, and access by non-essential personnel will be restricted.

2. The nearest potential residential receptors are more than a mile away. Because no active remedies are recommended, no impacts involving waste removal along transportation routes are anticipated.
3. DTSC's toxicologist reviewed the Feasibility Study and concurred with the recommendation of institutional controls to limit worker exposure and prevent residential exposure.
4. The implementation of ICs restricts land use for residential development at the site and will require approval prior to excavation activities.
5. Because only site walks to confirm that ICs are being followed would be required, no disturbance to vegetation would be expected. No endangered, threatened, or rare plant or animal species were observed at AFP 42 during biological surveys; therefore, none are expected to be present at the site.
6. A cultural study performed for AFP 42 indicated that the IRP sites do not contain paleontological resources. In addition, the Native American Heritage Commission performed a record search of its Sacred Lands File (SLF) for the affected area. The SLF failed to indicate the presence of Native American cultural resources at Air Force Plant 42. Also, DTSC sent solicitation letters to Native American contacts to find out if they have information on cultural resources at Air Force Plant 42 and did not receive interest from the Native American contacts. Cultural Resources are summarized in the October 2005 Integrated Cultural Resources Management Plan for AFP 42. Five federally recognized American Indian tribes are affiliated with the AFP 42 area; there are no known traditional cultural properties or sacred sites within the boundary of AFP 42. During previous contact with each of the tribes, no interest in the AFP 42 area has been expressed. Additionally, because only ICs are recommended, no disturbance is expected at the site.
7. The Air Force will submit an implementation plan for DTSC approval that includes land use controls equivalent to a land use covenant. Said land use controls will be recorded on the Base GIS Map and within the Plant's Land Use Control Document.
8. No groundwater plume is present at site 28. Soil contamination is limited to the top 2 feet of soil. Groundwater is at approximately 375 feet. The contaminants of concern left in place have limited mobility in soil and pose a low potential threat to groundwater.

Project Manager Signature

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